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VIA ECF

Honorable Lorna G. Schofield
United States District Court, Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Re: Update to Civil Case Management Plan and Scheduling Order
Timothy Rodgers v. Mercy College, et al., 23-cv-7278 (LGS)

Dear Judge Schofield:

Pursuant to the Court's February 8, 2024 Order (*see* Docket Entry No. 60), Plaintiff and Defendants Mercy College, Dr. Jose Herrera, and Dr. Timothy Hall submit this joint letter advising the Court of the proposed updated discovery deadlines for items 8(b) through 8(f) of the Civil Case Management Plan and Scheduling Order ("Case Management Plan") in the above-referenced matter. The proposed deadlines are as follows:

- Plaintiff's initial requests for the production of documents pursuant to FRCP 34 shall be served by: **February 20, 2024**
- Responsive documents to Plaintiff's initial requests for the production of documents shall be produced by: **March 4, 2024**
- Plaintiff's interrogatories pursuant to FRCP 33 shall be served by: **February 20, 2024**
- Depositions pursuant to FRCP 30 shall be completed by: **March 25, 2024**
- Requests to admit pursuant to FRCP 36 shall be served by: **March 26, 2024**

Plaintiff's deposition, which is presently scheduled for February 14, 2024, will be re-noticed for March 12, 2024.

Thank you for your time and attention to this matter.

Respectfully submitted,

/s/ Albert D. Manuel III

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/s/ Allison B. Gotfried

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